

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DEREK RODRIGUEZ,

Plaintiffs,

-against -

**EXPERT WITNESS
DISCLOSURE**

Docket No.: 19-civ-04728

VILLAGE OF PORT CHESTER and POLICE OFFICER
KEN MANNING, Shield No. 126, POLICE OFFICERS
JOHN DOE 1-5 and POLICE OFFICERS JANE DOE
1-3,

Defendants.
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PLEASE TAKE NOTICE, that pursuant to Federal Rules of civil Procedure 26(a)(2), the Plaintiff, DEREK RODRIGUEZ, discloses Richard N. Weinstein, M.D., as an expert witness in this action.

The qualifications of Doctor Weinstein are set forth in his Curriculum Vitae annexed hereto as Exhibit "B".

The grounds for Doctor Weinstein's opinions and the substance of his findings are set forth in his annexed narrative report, marked herein as Exhibit "A".

Doctor Weinstein will testify that the injuries sustained by Derek Rodriguez were sustained as a result of an assault by Police Officer Ken Manning and not as a result of Mr. Rodriguez jumping down from a porch onto ground several feet below him.

Doctor Weinstein's fee schedule is annexed hereto as Exhibit "C".

Also, Doctor Weinstein's testimonies for the prior four years are annexed as Exhibit "D".


Doctor Weinstein has reviewed the relevant medical records and radiological films including x-rays and CT-scans from Greenwich/Yale New Haven Hospital as well as those generated by his office.

PLEASE TAKE FURTHER NOTICE, that pursuant to Fed. R. Civ. Pro. 26e(2), Plaintiff reserves the right to supplement or amend this response up until and including the time of trial.

Dated: White Plains, New York
July 27, 2020

Yours, etc.,

LAW OFFICES OF
FRANCIS X. YOUNG, PLLC



FRANCIS X. YOUNG (8205)
Attorneys for Plaintiff, DEREK RODRIGUEZ
11 Martine Avenue, 12th Floor
White Plains, New York 10606
(914) 285-1500

TO:

SOKOLOFF STERN LLP
BRIAN S. SOKOLOFF, ESQ.
Attorneys for Defendants, VILLAGE OF PORT CHESTER
and POLICE OFFICER KEN MANNING
179 Westbury Avenue
Carle Place, New York 11514
(516) 334-4500
File No. 180146